

Exhibit A

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

In re:)	Chapter 11
)	
MERCY HOSPITAL, IOWA CITY,)	Case No. 23-00623 (TJC)
IOWA, <i>et al.</i>)	
)	(Jointly Administered)
Debtors.)	
)	

**[PROPOSED] ORDER EXTENDING MERCY HEALTH NETWORK, INC.'S
DEADLINE TO PRODUCE RESPONSIVE DOCUMENTS AND COMMUNICATIONS
TO THE OC**

This matter is before the Court upon the *Motion to Extend the Deadline to Produce Responsive Documents and Communications to the OC* (the “Motion”) filed by Mercy Health Network, Inc. d/b/a MercyOne (“MercyOne”);¹ and the Court having found it has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue in this district is proper pursuant to 28 U.S.C. § 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtor, its creditors, and other parties in interest; and the Court having found that MercyOne provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein:

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED as follows:

1. The Motion is GRANTED as set forth herein.
2. The deadline for MercyOne to produce responsive documents and communications pursuant to the *Order Granting Motion of the Trust Oversight Committee Requiring MercyOne to*

¹ All capitalized terms not defined herein shall have the meanings affixed to them in the Motion.

Produce Records and Submit to Examination Pursuant to Bankruptcy Rule 2004 [Docket No. 1854] (the “Rule 2004 Order”) is hereby extended through and including May 23, 2025.

3. All other provisions set forth in the Order shall remain in effect and nothing in this Order shall prejudice a party’s right to request or obtain an additional extension in relation to the Rule 2004 Order.

4. Notwithstanding any applicability of any Bankruptcy Rule, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. MercyOne is authorized to take all actions, and to execute all documents, necessary or appropriate, to effectuate the relief granted in this Order in accordance with the Motion.

6. The Court retains exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation, and enforcement of this Order.

Dated and entered this _____ day of May, 2025.

Honorable Thad J. Collins, Chief Judge

Prepared and submitted by:

Edward J. Green (*Pro Hac Vice*)

David B. Goroff (*Pro Hac Vice*)

FOLEY & LARDNER LLP

321 N. Clark Street, Suite 3000

Chicago, IL 60654

Tel: (312) 832-4500

Fax: (312) 832-4700

egreen@foley.com

dgoroff@foley.com

-and-

Jake W. Gordon (*Pro Hac Vice*)

FOLEY & LARDNER LLP

500 Woodward Avenue, Suite 2700

Detroit, MI 48226
Tel: (248) 943-6484
jake.gordon@foley.com

-and-

Michael R. Reck
Christopher J. Jessen
BELIN McCORMICK, P.C.
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309
Tel: (515) 243-7100
Fax: (515) 558-0675
mrreck@belinmccormick.com
cjessen@belinmccormick.com

Counsel to Mercy Health Network, Inc., d/b/a MercyOne